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*Attorneys for Defendants City of Henderson,  
Denzell Jones, F. Gibson*

**UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA, LAS VEGAS DIVISION**

SEVAG SAGHERIAN, individually,  
  
Plaintiff,

v.

DENZELL JONES; F. GIBSON; CITY OF  
HENDERSON; MICHAEL BLOW; DOES I  
through X; and ROE CORPORATIONS I  
through X, inclusive,  
  
Defendants.

CASE NO.: 2:23-CV-00497-GMN-DJA

**STIPULATION AND ORDER TO SET  
ASIDE DEFAULTS AND  
WITHDRAW PENDING MOTION  
FOR ENTRY OF DEFAULT  
(FIRST REQUEST)  
(ECF No. 10 & 9)**

Defendants Denzell Jones, F. Gibson, and City of Henderson and Plaintiff Sevag Sagherian  
hereby stipulate and agree as follows:

- Plaintiff's Request (Motion) for Entry of Default as to Defendants Gibson and City of Henderson was filed with the Court on June 5, 2023. (ECF No. 7).
- Plaintiff's Request (Motion) for Entry of Default as to Defendant Jones was filed with the Court on June 8, 2023. (ECF No. 9).
- On or about June 12, 2023, counsel for Defendants Jones, City of Henderson, and

Gibson notified Plaintiff that a copy of the Complaint (ECF No. 1) had not been served with the summons on Defendants Jones, City of Henderson, and Gibson.

- Plaintiff and counsel for Defendants Jones, City of Henderson, and Gibson agreed that if Plaintiff would withdraw his Requests for Default (ECF Nos. 7 & 9) and vacate or set aside any default entered, that counsel for Defendants Jones, City of Henderson, and Gibson would waive service and file their responses to Plaintiff's Complaint within 30 days of the date of entry of an order confirming the completion of such action.<sup>1</sup>
- On June 14, 2023, Plaintiff notified counsel that he had submitted Plaintiff's Withdrawal of Requests for Entry of Default against Defendants Jones, City of Henderson, and Gibson to the Court.
- On June 20, 2023, a Clerk's Entry of Default entered against Defendants City of Henderson and F. Gibson. (ECF No. 10). Default has not been entered against Defendant Jones per Plaintiff's Motion for Entry of Default. (ECF No. 9).
- On June 22, 2023, Plaintiff's Withdrawal of Requests for Entry of Default was filed with the Court. (ECF No. 11).

Accordingly, the Parties submit this stipulation is supported by good cause and hereby request that the Court set aside the Clerk's Entry of Default as to City of Henderson and F. Gibson (ECF No. 10) and withdraw Plaintiff's Motion for Entry of Default against Defendant Jones as requested per Plaintiff's Withdrawal of Requests for Default. (ECF No. 11).

The Parties further agree that upon filing of the Court's Order approving this Stipulation and setting aside the Clerk's Entry of Default (ECF No. 10) and withdrawing/vacating Plaintiff's pending

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<sup>1</sup> Counsel for Defendants Jones, City of Henderson, and Gibson notified Plaintiff that he had not been authorized by former Interim Chief Michael Blow to waive service on his behalf. To that end, this stipulation applies only to Defendants Jones, City of Henderson, and Gibson.

1 Request for Default (ECF No. 9), that counsel for Defendants Jones, City of Henderson, and Gibson  
2 will waive service of process as to Defendants Jones, City of Henderson, and Gibson and file a  
3 response to Plaintiff's Complaint within 30 days of entry of the Court's Order.

4 DATED this June 27, 2023.

DATED this June 27, 2023.  
City of Henderson

6 /s/ Sevag Sagherian  
7 **SEVAG SAGHERIAN**  
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Henderson, Nevada 89044  
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9 Plaintiff in Pro Se

/s/ Brian Anderson  
**Brian Anderson**  
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Henderson, NV 89015  
*Attorneys for Defendants*

11  
12 **ORDER**

13 IT IS SO ORDERED.

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UNITED STATES DISTRICT COURT JUDGE

17  
18 June 27, 2023

19 DATED:  
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CITY ATTORNEY'S OFFICE  
CITY OF HENDERSON  
240 S. WATER STREET MSC 144  
HENDERSON, NV 89015

